

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
COLUMBUS DIVISION**

In Re: Case No. 16-57205

Jill R Carter Chapter 13

Debtor(s). Judge John E. Hoffman, Jr.

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**AGREED RESPONSE TO MOTION TO DEEM MORTGAGE CURRENT (Doc 54)**

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U.S. Bank Trust National Association as Trustee of the Igloo Series III Trust  
("Creditor"), by and through their undersigned counsel, hereby files this agreed response to the  
Trustee's Motion to Deem Mortgage Current filed on April 02, 2020.

1. Creditor agrees that the pre-petition arrearage claim of Creditor has been paid in full.
2. Creditor agrees that all ongoing post-petition mortgage payments have been made through the Final Payment Date, and that all such payments are deemed to have been made on a timely basis.
3. Creditor agrees that the mortgage obligation to Creditor is deemed current as of the Final Payment Date.
4. Creditor agrees to adjust its loan balance to reflect the balance delineated in the original amortization schedule (or if the loan was modified, modified amortization schedule) as of the Final Payment Date, and agrees any amounts in excess of that balance, including any

alleged arrearages, costs, fees or interest are discharged pursuant to 11 U.S.C. §1328.

Respectfully Submitted,

/s/ Jon J. Lieberman

Jon J. Lieberman (0058394)  
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Attorney for Creditor

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Response was served **electronically** on April 20, 2020 through the Court's ECF System on all ECF participants registered in this case at the e-mail address registered with the Court

And by **ordinary U.S. Mail** on April 20, 2020 addressed to:

Jill R Carter, Debtor  
21522 Buena Vista Road  
Rockbridge, OH 43149

/s/ Jon J. Lieberman

Jon J. Lieberman (0058394)  
Attorney for Creditor